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HUSBAND AND WIFE — RIGHTS AND LIABILITIES OF HUSBAND AS TO THIRD PARTIES — EFFECT OF MARRIED WOMEN'S PROPERTY ACTS ON HUSBAND'S ACTION FOR LOSS OF CONSORTIUM. — In an action by the plaintiff to recover for injuries resulting from an accident, caused by the defendant's negligence, in which both the plaintiff and his wife were injured, he sought to recover damages for the loss of his wife's companionship and services. His wife had recovered full damages for all her injuries in a previous action. *Held*, that, in view of modern legislation regulating the status of married women, the plaintiff cannot recover. *Marri v. Stamford Street R. Co.*, 78 Atl. 582 (Conn.).

A recent Massachusetts case reaches the same result. *Bolger v. Boston Elevated Ry. Co.*, 205 Mass. 420. The weight of authority, however, under similar statutes, is that the husband may recover, as at common law, for loss of his wife's domestic services. *Thuringer v. New York Central & Hudson River R. Co.*, 71 Hun (N. Y.) 526; *Booth v. Manchester Street Ry.*, 73 N. H. 529. See 9 HARV. L. REV. 473. But the wife alone can recover for loss of earnings in an independent business. *Riley v. Lidke*, 49 Neb. 139. Where the wife assists the husband in his business, her incapacity is usually regarded as his loss. *Standen v. Pennsylvania R. Co.*, 214 Pa. St. 189. But it is otherwise where she is regularly paid by him for such services. *Kirkpatrick v. Metropolitan Street Ry. Co.*, 129 Mo. App. 524. On principle, the view of the principal case seems in many ways preferable. The wife has no action for loss of her husband's services. *Goldman v. Cohen*, 30 N. Y. Misc. 336; *Glenn v. Western Union Telegraph Co.*, 1 Ga. App. 821. Moreover, the retention of the husband's action may lead to double recovery for the wife's loss of time from household work. *Perrigo v. City of St. Louis*, 185 Mo. 274; *Colorado Springs & Interurban Ry. Co. v. Nichols*, 41 Colo. 272. The soundness of the result of the principal case depends upon how far modern statutes have destroyed the fiction of the unity of husband and wife, and it seems not a strained construction that they make them independent at least as against third parties. *Cf. Thompson v. Thompson*, 218 U. S. 611; 24 HARV. L. REV. 403.

INJUNCTIONS — ACTS RESTRAINED — BALANCE OF CONVENIENCE DOCTRINE. — The defendant company erected a temporary roundhouse and railroad yards a short distance from the plaintiff's property, the use of which was impaired by the noise, smoke, and cinders resulting therefrom. The court found that the defendant was not negligent and that the improvements contemplated were being pushed to completion with all reasonable speed. The plaintiff sought an injunction and damages. *Held*, that the injunction should not issue. *Herrlich v. N. Y. C. & H. R. R. Co.*, 126 N. Y. Supp. 311 (Sup. Ct.).

For a discussion of the principles involved, see 22 HARV. L. REV. 61.

INNKEEPERS — INNKEEPER'S LIEN — WHETHER LIEN ATTACHES TO PROPERTY DEPOSITED FOR A PARTICULAR PURPOSE. — A deposited with the defendant, an innkeeper, as security for a loan, certain tickets which he, as guest, had brought to the inn. The tickets had been stolen from the plaintiff, who brought an action for conversion. *Held*, that he may recover. *Matsuda v. Waldorf Hotel Co.*, 27 T. L. R. 153 (Eng., K. B. D., Dec. 14, 1910).

The innkeeper has a lien on any goods brought by a guest for the whole amount due. *Mulliner v. Florence*, 3 Q. B. D. 484. And this may be asserted against the true owner if the goods have been stolen. *Robins & Co. v. Gray*, [1895] 2 Q. B. 501. Probably also it may be used to enforce repayment of money lent, though lending is not a part of the innkeeper's undertaking. See *Proctor v. Nicholson*, 7 C. & P. 67; *Watson v. Cross*, 2 Duv. (Ky.) 147. However, it seems that the lien should not attach to property deposited as security for a particular debt. It is a general rule that security deposited for one indebted-